

## Department of Energy

Richland Field Office

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Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
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Richland, Washington 99352

Mr. David B. Jansen, P.E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

### 100 AREA FEASIBILITY STUDY (FS) PHASES 1 AND 2

The U.S. Department of Energy, Richland Field Office (RL) is pleased to submit the "100 Area Feasibility Study (FS) Phases 1 and 2, DOE/RL-92-11, Draft A" (enclosure) to the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) for review per section 9.2.1 of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). This letter also documents the strategy used by RL to develop the 100 Area FS Phase 1 and 2. This strategy is consistent with the Hanford Site Past-Practice Remedial Investigation (RI)/FS (Resource Conservation and Recovery Act Facility Investigation/Corrective Measures Study) Process for the 100 Areas agreed to by RL, EPA and Ecology 100 Area Unit Managers.

From 1989 through early 1991, RL submitted draft RI/FS work plans for ten Hanford Site 100 Area operable units (OUs) to EPA and Ecology for review. In each work plan (one per OU), written in accordance with EPA's "Guidance for Conducting Remedial Investigations/Feasibility Studies Under CERCLA, Interim Final" (EPA, 1988), RL committed to preparing a Phase 1 and 2 FS for the purpose of identifying and performing an initial screening of remedial alternatives. In early 1991, 100 Area Unit Managers from all three Tri-Party Agreement members recognized that a large portion of the Phase 1 and 2 FSs for each 100 Area OU would be repetitious due to the similarity of waste sites. To address this issue, along with many others, RL, EPA and Ecology approved Tri-Party Agreement Change Control Form number M-12-90-4, "Modification of Milestones M-12-00 and M-13-00 to Implement Aggregate Area Management Strategy" on September 9, 1991. Specifically it is stated in the "Description /Justification...for...M-12-90-4" (100-Area Approach, Item 7):

"DOE would not develop new FS reports on an operable unit basis. Rather, it would conduct three stand alone or 'base' FS reports for the entire 100-Area. These reports would consider 1) source operable units (except N-Area), 2) groundwater operable units, and 3) N-Area, as it is distinctly different from the other 100-Areas."

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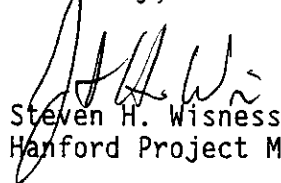
When the justification for M-12-90-4 was written (summer of 1991), the Hanford Site Past-Practice Strategy (HSPPS) was still under development. Since that time, implementation of HSPPS in the 100 Area has been defined in text located in chapter 1 of all rescoped 100 Area OU RI/FS work plans, as agreed by RL, EPA, and Ecology 100 Area Unit Managers. The text states the 100 Area FS Phase 1 and 2 will be developed on an aggregate area basis.

The 100 Area FS Phase 1 and 2 (submitted by RL to EPA and Ecology) meets Tri-Party Agreement objectives described in the description/justification of M-12-90-4, however the FS has been streamlined further by condensing the three "base" studies into a single document to avoid the duplication of large amounts of common information. The 100 Area FS Phase 1 and 2 has been prepared as a single document, with FS tasks separated according to three media: soils/river-bank sediments, solid wastes, and groundwater. Additionally, the 100-N Area is treated as a separate site, due to its somewhat unique waste site characteristics compared to other 100 Area reactor area waste sites. This approach was discussed by the Tri-Party Agreement 100 Area Unit Managers at a meeting on June 4, 1992, and EPA and Ecology representatives expressed their willingness to review the 100 Area FS Phases 1 and 2 prepared in the manner identified above.

The 100 Area Phase 1 and 2 FS report is built around existing data (including reactor operation process knowledge and data collected during almost 50 years of Hanford Site environmental monitoring and investigations). Use of existing data to initiate the FS process was necessary to prevent unacceptable schedule delays in starting subsequent programs such as treatability studies. Use of new waste site characterization data acquired during limited field investigations (LFIs) will be important for later detailed analysis of remedial alternatives in OU focused FSs, however new data is not expected to produce adverse effects on the results and recommendations of the 100 Area FS Phase 1 and 2. New or unexpected developments identified during analysis of LFI or other relevant applicable data that requires a reassessment of FS Phase 1 and 2 results and recommendations can be accomplished in OU focused and final FS tasks.

Please address comments or questions regarding this correspondence or Hanford Site 100 Area Past-Practice environmental investigations to Mr. Eric Goller on (509) 376-7326.

Sincerely,

  
Steven H. Wisness  
Hanford Project Manager

ERD:EDG

Enclosure

cc: Attached

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Letter # 92-ERB-170

cc w/encl:

A. DeAngeles, PRC  
B. Droust, USGS  
D. Faulk, EPA (4)  
L. Goldstein, Ecology (3)  
B. Kane, Parametrix  
J. Sprecher, Brown and Caldwell  
D. Teel, Ecology (3)  
Administrative Record, H4-22

cc w/o encl:

S. Balone, EM-442  
R. Henckel, WHC  
M. Lauterbach, WHC  
R. Lerch, WHC  
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T. Veneziano, WHC

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